



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 782-3397  
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 - (312) 814-6026

ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

(217) 557-8155  
(FAX) 782-3258

May 22, 2008

Engineering Field Activity, Midwest  
Attn: Mr. Howard Hickey  
Building 1A, Code 931  
201 Decatur Avenue  
Great Lakes, Illinois 60088-5600

Re: Final Remedial Investigation and Risk  
Assessment Report for Site 1 - Golf Course  
Landfill, Naval Station Great Lakes  
Great Lakes, Illinois

0971255048 - Lake  
Great Lakes Naval Station  
Superfund/Technical

Dear Mr. Hickey:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the submitted Final Remedial Investigation and Risk Assessment Report for Site 1 - Golf Course Landfill, Naval Station Great Lakes. It was drafted by Tetra Tech NUS, Inc. on behalf of the Naval Facilities Engineering Command (Navy). It was dated March 2008 and was received at the Agency on March 31, 2008. Accompanying the report were the Navy responses to previous Agency comments regarding the draft version of that report. The Agency has conducted a review of the Navy's responses and the submitted final report and has generated the following additional comments.

- 1) **Response to Comment #3:** Illinois EPA's original comment asked for clarification of screening values included in Table 2-3. The Tiered Approach to Corrective Action Objectives (TACO) screening values based on extraction analysis were appropriately removed from Table 2-3; however, closer scrutiny revealed additional concerns. Most of the screening values in the column identified as "USEPA Generic SSL's for Migration from Soil to Groundwater (DAF 1)" do not agree with the literature source for these concentrations. Additionally, almost all of the entries of "NC" in the columns identified as coming from TACO sources have objectives available on the Agency's web site in tables presented in "Chemicals Not in TACO". The TACO-like values should be entered into Table 2-3. Because Table 2-3 contains screening values used to identify chemicals of concern, all entries should be confirmed and the table revised accordingly.

ROCKFORD - 4302 North Main Street, Rockford, IL 61103 - (815) 987-7760 • DES PLAINES - 9511 W. Harrison St., Des Plaines, IL 60016 - (847) 294-4000  
ELGIN - 595 South State, Elgin, IL 60123 - (847) 608-3131 • PEORIA - 5415 N. University St., Peoria, IL 61614 - (309) 693-5463  
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SPRINGFIELD - 4500 S. Sixth Street Rd., Springfield, IL 62706 - (217) 786-6892 • COLLINSVILLE - 2009 Mall Street, Collinsville, IL 62234 - (618) 346-5120  
MARION - 2309 W. Main St., Suite 116, Marion, IL 62959 - (618) 993-7200

- 2) **Response to Comment #19:** The Agency's request for information regarding exposure units (EU) has led to additional comments. We define EUs as site-specific, geographical areas that correspond to anticipated contact zones for the respective receptors. For example, on a chronic basis, groundskeepers are assumed to routinely contact the entire site during their hypothetical activities; a resident, however, would be restricted to a much smaller area ( $\frac{1}{4}$  to  $\frac{1}{2}$  acre). Thus the exposure point concentration (EPC) for the current groundskeeper receptor should reflect contaminant concentrations detected over the entire site while the residential EPC should include concentrations from the most highly contaminated prospective housing lot. Construction workers are typically evaluated using the maximum contaminant levels since it is possible that they will work in the most highly contaminated area for the duration of their short exposure. Differences in exposure units for ecological receptors can be just as dramatic as exemplified by comparing the contact potentials of an earthworm to that of a hawk. Definitions of exposure units and calculations of environmental point concentration values should be revised to reflect these concepts.
- 3) **Response to Comment #21:** Exposure units and exposure point concentrations for contact with lead contaminated soil should be reevaluated to reflect the concepts presented in the previous comment.

Illinois EPA cannot concur with the contents of the Navy's Final Remedial Investigation and Risk Assessment Report for Site 1 at this time. Once these additional comments have been properly addressed and the revisions verified, Illinois EPA will then affix the appropriate signatures to the Title page and return it to you for inclusion in the Final document.

If you have any questions regarding anything in this letter or require any additional information, please contact me at (217) 557-8155 or by electronic mail at [Brian.Conrath@illinois.gov](mailto:Brian.Conrath@illinois.gov).

Sincerely,

*Brian A. Conrath*

Brian A. Conrath  
Remedial Project Manager  
Federal Facilities Unit  
Federal Site Remediation Section  
Bureau of Land

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cc: Bob Davis, Tetra Tech NUS, Inc.

Owen Thompson, USEPA (SR-6J)